

Applicant : Ajay P. Sravanapudi and Richard Dean  
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Attorney's Docket No.: 16438-011001

### REMARKS

#### I. Information Disclosure Statement

The examiner states that the information disclosure statement (IDS) filed on June 26, 2003 fails to refer to the present application and therefore has not been considered by the examiner.

The applicant respectfully requests that the IDS filed on June 26, 2003 be considered because it was timely filed and correctly refers to the present application. The applicant further requests that the examiner strike the caption of on the 1449A-PTO which was attached to the IDS filed on June 26, 2003 and replace this caption with the proper application number, filing date, and inventor, which were correctly listed on the IDS filed on June 26, 2003.

#### II. 112 Rejections

Claims 14-18 and 28-35 and 39-41 were rejected for lack of written description. Specifically, the examiner states that the following limitations are not described in the specification:

Claim 14: "a multi-modal e-business alert configuration that dictates different aspects of how said multimodal e-business alert service is to behave" is not described in the specification.

Claim 15 and 18: "tracking/storing the performance of the multimodal e-business alert service via various queues".

The applicant respectfully disagrees. As the limitation of claim 14, this feature is described in FIG. 13 (EBA configuration 1440) and the accompanying text, paragraphs [0078]-[0091]. As to the limitation of claims 15 and 18, this feature is shown in FIG. 15 (queues 1520a, 1525, 1530a, 1530b, 1530c, 1530d) and the accompanying text, paragraphs [0121]-[0128].

The applicant respectfully requests that the written description rejection be withdrawn.

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III. 102 Rejections of Claims 1-13, 19-26 and 28-38; 103 Rejection of Claim 27

Claims 1-13, 19-26, and 28-38 were rejected under 35 U.S.C. 102(e) as being unpatentable over Nagai. Claim 27 was rejected under 35 U.S.C. 103(a) as being unpatentable over Nagai. Claim 1 recites in part:

1. A system for multimodal information services, comprising:

a multimodal information service mechanism for providing said multimodal information services, said multimodal information services including a service capable of receiving requests from a user for information represented in a source modality, and responding to the requests by retrieving the information in the source modality and delivering the information back to the same user that requested the information, but in a destination modality that is different from the source modality;

an information user at a user site ... said information user requesting and receiving said multimodal information services from said multimodal information service mechanism;

and an information source ... said information source providing multimodal information requested by said information user to said multimodal information service mechanism to facilitate said multimodal information services, said information source being external to said user site and said multimodal information service mechanism.

Nagai describes a computer-telephony integration (CTI) system 100 and method for routing information from a sender side to a recipient side. The information to be routed originates from the sender side and is in a format used by the sender side. A CTI server 300 receives the information from the sender side, converts the information to a different format used by the recipient side, and then routes the converted information to the recipient side. The CTI server 300 can convert from a telephone format to a facsimile or computer format, and vice versa (Col. 6, line 52-Col. 7 line 3).

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In the office action, the examiner equates the CTI server process 300 to the multimodal information services mechanism and method recited in claims 1 and 19 (Office action page 3). The applicant respectfully disagrees.

The CTI server 300 does not provide a service capable of receiving requests from a user for information represented in a source modality, and responding to the requests by retrieving the information in the source modality and delivering the information back to the same user that requested the information, but in a destination modality that is different from the source modality, as recited in claim 1. Instead, the CTI server 300 receives information from one user (sender) and then sends this information to a different user (recipient).

Furthermore, the information that is being sent by the CTI server 300 is not information that the CTI server 300 retrieves from an information source that is external to both the server and the user site, as recited in claim 1. Instead, the CTI server 300 obtains the information from the user (sender).

Furthermore, as to claims 42 and 44, to the extent that the CTI server 300 converts the information being routed, the CTI server 300 does not store the converted information for future use.

Furthermore, as to claims 43 and 45, the CTI server 300 also does not determine whether the converted information already exists, and if so, then use the existing information instead of converting the information.

Laflin fails to make up for the deficiencies of Nagai because Laflin fails to describe a system and method for multimodal information services. Instead, Laflin describes a system and method for sorting and storing messages by categories. Laflin does not describe messages that are multimodal.

For at least these reasons, the applicant respectfully submits that claim 1 and its dependent claims are not anticipated or rendered obvious by Nagai and/or Laflin.

Claims 6, 12, 19, 24, and 36, and their dependent claims, contain similar limitations as those discussed above with respect to claim 1. Thus, these claims are also not anticipated or

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rendered obvious by Nagai and/or Laflin for similar reasons as those given above with respect to claim 1.

IV. 103 Rejections of claims 14-17, 39-41

Claims 14-17, 39-41 are rejected under 35 U.S.C. 103(a) as being unpatentable over Nagai in view of Laflin.

Claim 14 recites in part:

14. A system of multimodal information service application for multimodal e-business alert service, comprising:

a multimodal e-business alert configuration ... and

a multimodal e-business alert unit for generating a multimodal e-business alert

based on said configuration.

Claim 14 has been amended to clarify the invention. However, the applicant believes that the original claim 14 was not rendered obvious by Nagai and Laflin for at least the following reasons.

The examiner cites to the business application server 204 of Nagai as disclosing all the features of the multimodal information service application for multi-modal e-business alert service recited in claim 14, except for the feature that the generated messages are e-business alert messages. The examiner then cites to Laflin for this single feature.

The applicant respectfully disagrees with the examiner. The applicant respectfully submits that the examiner has failed to establish a prima facie case for obviousness because the cited references fail to show or suggest all the claim limitations. The examiner fails to cite to any portions of Nagai in support of his conclusion that the business application server 204 of Nagai discloses nearly all the claim limitations of claim 14. For example, the examiner has failed to cite to any portion of Nagai that describes the business application server 204 as having a configuration or a unit for generating messages based on the configuration, as recited in claim 14. In fact, Nagai fails to describe any details of the business application server 204. Thus,

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Nagai fails to disclose the business application server 204 as having any of the features recited in claim 14 or any of its dependent claims.

Claim 39, and its dependent claims, contain similar limitations as those discussed above with respect to claim 14. Thus, these claims are also not rendered obvious by Nagai and Laffin for similar reasons as those given above with respect to claim 14.

Please charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: 2-24-05

  
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